



August 6, 2008

Mr. Chad A. Stobbe
Land Quality Bureau
Iowa Department of Natural Resources
502 East 9th Street
Wallace State Office Building
Des Moines, Iowa 50319-0034

Dear Mr. Stobbe:

Since 1993, we have been spreading our solid by-product waste on agricultural land in the Davenport area. For many years, we had a permit through the Iowa DNR. For the past couple years, we have been spreading it using a fertilizer license with the Iowa Department of Agriculture and Land Stewardship. We have spread millions of pounds of solid waste from our gelatin manufacturing process with a lot of success. The waste provides farmers with approximately 75 pounds of nitrogen and 25 pounds of phosphorus per acre. The farmer's crops have responded very positively to the free waste we have provided to them.

In your recent letter about IAC 567 Chapter 108 you wrote "the land application of solid waste is considered disposal and not a beneficial use". We believe this statement to be incorrect. Our 15 years of experience proves that farmers want and have benefited from the nutrients and soil enhancement properties of our solid waste product.

We would like the DNR to keep the Chapter 121 regulations in full effect. There may be a time in the future where we have other solid or liquid byproducts that would be beneficial to crops and be regulated by Chapter 121. By forcing us to get a fertilizer/soil conditioner licenses from the Department of Agriculture or making us operate under the Chapter 64 regulations would be a severe burden to our efforts to recycle this waste in the proven, safe and effective method we have been using for well over a decade.

Sincerely,

Brent Bullock
General Manager of Operations

PB Leiner USA, member of TESSENDERLO GROUP

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